

EXHIBIT I

Confidential (Per 2004 MDL 1358 Order)

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: METHYL TERTIARY-BUTYL : MASTER FILE NO.
ETHER ("MTBE") PRODUCTS : 1:00-1898
LIABILITY LITIGATION : MDL 1358 (SAS):
 : No. M21-88

THIS DOCUMENT RELATES TO: :

COMMONWEALTH OF PUERTO :
RICO, et al., :
Plaintiffs, :

vs. : Case No.:

SHELL OIL CO., et al., : 07-CIV-10470(SAS)

Defendants. :-

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THIS TRANSCRIPT CONTAINS CONFIDENTIAL

DOCUMENT(S), INFORMATION OR OTHER THINGS

Videotaped 30(b)(6) Deposition of

Commonwealth of Puerto Rico

By and through its Designated Representative

BRUCE K. GREEN

Washington, D.C.

Wednesday, November 20, 2013

Reported by: Janet A. Hamilton, RDR

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1 5 Topic No. 1 Well Index?

2 A. No.

3 Q. Do you know who did?

4 A. Counsel provided me this document. I don't
5 know who, who made this list.

6 Q. With regard to this list, it cross-references
7 a topic number 1. Am I correct? Designated issue
8 number 1?

9 A. I believe that it cross-references other
10 topics that are not specific to the line about having
11 impacted, been impacted or threatened by releases of
12 MTBE. It's more of a generic question regarding the
13 general water resources of the area and wells that,
14 because in, in definition number 16, the definitions of
15 wells refers to those wells that are public or private
16 within plaintiffs' April 27, 2012, trial site
17 delineation for Trial Site No. 5 including but not
18 limited to the wells identified below, and those were
19 Coco, C-O-C-O well, and Santa Maria.

20 So my understanding of this was that there
21 was interest in finding out beyond those two wells,
22 Coco and Santa Maria, what other water resources, wells
23 were in the area, in the delineated area, and to
24 properly answer some of these questions, topics in the
25 back such as 6, 7, 8, 9, 10, 11, 12, these are more

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1 generic questions that have, don't mention threats of
2 impact.

3 So to the extent that I thought we should be
4 as inclusive as we can and provide as much information
5 to you as possible, I requested to counsel if we could
6 identify every single well that was in that delineated
7 area.

8 Q. Understood. Let's see if we can begin with a
9 basic description of the Topic No. 1 Well Index for
10 Trial Site 5. Where it says site number, that number
11 designation indicates what?

12 A. That is a USGS ID number based on a latitude
13 and longitude.

14 Q. And with respect to the latitude and
15 longitude, they are also indicated in the third and
16 fourth columns from the left; am I correct?

17 A. That's correct, and my understanding is that
18 in many times older wells were, the latitude/longitude
19 in their original site ID were used with pre-GIS
20 technology. So rather than, and this is what I
21 understand. I'm not sure if it's in all jurisdictions,
22 but if it was a 50-year-old well, it was tagged with
23 the latitude/longitude taken from a map, a topo map,
24 but with the onset of GIS technology and the change to
25 decimal latitude/longitude that would be the location